

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 BRIGGS MATHESON (CABN 291287)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-6844
FAX: (415) 436-7234
8 briggs.matheson@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12

13 UNITED STATES OF AMERICA,) Case No. 19-CR-225-RS
14 Plaintiff,)
15 v.) STIPULATION AND ORDER TO CONTINUE
16 CHAD SUNDERLAND,) STATUS CONFERENCE AND TO EXCLUDE
17 Defendant.) TIME UNDER THE SPEEDY TRIAL ACT

18

19 On August 27, 2019, the parties in the above-captioned case appeared before this Court for a
20 status conference. Dkt. No. 26. At that time, the parties informed the Court that the government had
21 recently produced additional discovery and that the parties were engaged in discussion regarding a
22 potential resolution of the case. The parties therefore asked the Court to set a further status conference
23 on October 1, 2019. Based on the agreement of the parties and for good cause shown, the Court
24 excluded time under the Speedy Trial Act until October 1, 2019. Dkt. No. 28.

25 The parties now stipulate and respectfully request that the status conference be continued to
26 November 5, 2019, at 2:30 p.m. The parties request this continuance for defense counsel to review
27 discovery—including DNA and fingerprint lab reports, which the government recently received and
28 produced to the defense—and to allow additional time for the parties' ongoing discussions regarding a

1 pretrial resolution in this case.

2 The parties further agree and jointly request that the time between October 1, 2019, and
3 November 5, 2019, should be excluded under the Speedy Trial Act to provide reasonable time necessary
4 for effective preparation of counsel, and to continue their productive negotiations regarding a pretrial
5 resolution, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice are
6 served by granting the continuance and outweigh the interests of the public and the defendant in a
7 speedy trial.

8 **IT IS SO STIPULATED.**

9
10 DAVID L. ANDERSON
11 United States Attorney

12 Dated: September 26, 2019

13 _____
14 /s/
15 BRIGGS MATHESON
16 Assistant United States Attorney

17 Dated: September 26, 2019

18 _____
19 /s/
20 ANN McGLENON
21 Counsel for Defendant CHAD SUNDERLAND

ORDER

Based on the reasons provided in the stipulation of the parties above, and for good cause shown, the Court hereby ORDERS that the status conference in the above-captioned matter is continued to November 5, 2019, at 2:30 p.m. The Court further ORDERS that the exclusion of time from October 1, 2019, to November 5, 2019 (inclusive), is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A). The failure to grant the requested continuance would deny defendant effective preparation of counsel. 18 U.S.C. §§ 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: 9/26/19


HON. RICHARD SEEBORG

HON. RICHARD SEEBORG
United States District Judge